

Exhibit B

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

AUDI PRIVATE BANK, S.A.L.,

Plaintiff,

- against -

WELLS FARGO BANK, N.A.,

Defendant.

Index No. 161483 / 2015

**NOTICE OF MOTION FOR SUMMARY
JUDGMENT IN LIEU OF COMPLAINT**

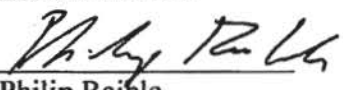
PLEASE TAKE NOTICE that, upon the accompanying affidavit of Jihad Rizkallah, sworn to on September 17, 2015 ("Rizkallah Affidavit"), the accompanying affidavit of Philip Raible sworn to the 6th day of November, 2015, the exhibits annexed thereto, and the accompanying Memorandum of Law, plaintiff Audi Private Bank, S.A.L. ("Audi Private Bank") in lieu of filing a Complaint in this action, will move this Court, in the Motion Submission Part, Room 130, of the Courthouse located at 60 Centre Street, New York, New York, at 9:30 AM on the 22nd day of December, 2015 at 9:30am, or as soon thereafter as counsel may be heard, for an order, pursuant to CPLR §§ 3213 and 5303, granting plaintiff summary judgment to recognize, domesticate and/or enforce in New York a judgment which plaintiff obtained in Lebanon against Wells Fargo Bank, NA in the amount of \$8,494,875 plus interest from June 29, 2004 and which is attached as Exhibit A to the Rizkallah Affidavit (the "Judgment"), and such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to CPLR §§ 3213 and 2214(b), answering papers, if any, shall be served upon the undersigned counsel for plaintiff no later than seven (7) days prior to the return date of this motion, or no later than December 15, 2015.

PLEASE TAKE FURTHER NOTICE that, pursuant to CPLR § 2214(b), reply affidavits and papers, if any, shall be served at least one (1) day prior to the return date of this motion.

Dated: New York, New York
November 6, 2015

RAYNER ROWE LLP

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